

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO
POSTAL SERVICE WITNESS RACHEL

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatories to Postal Service witness Rachel GCA/USPS-T8-1 to -5

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media).

January 27, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T8-1

Please refer to page 7, lines 13-18 of your prefiled testimony.

(a) Please define the term “postal area” as used at line 15.

(b) Please explain fully the scope (e.g., nationwide, postal-area-wide, installation-wide) of the contractual prohibition on reassignment, without mutual consent, of covered employees to a withheld position in a different installation within the same postal area more than once in every three months.

GCA/USPS-T8-2

Please refer to page 13, lines 1-6, of your prefiled testimony.

(a) Please supply citations, including Web addresses or links where applicable, to all Office of Personnel Management (OPM) regulations or other publications governing Voluntary Early Retirement, both in general and as it applies to the Postal Service.

(b) Please describe fully the scope of the OPM authorization mentioned in lines 5-6 of page 13, including, without limitation, (i) whether the authorization applies to the Postal Service as a whole; to specific programs, regions, employee categories, or other sub-units; or to individual employees; (ii) the duration of such authorization(s); and (iii) the time reasonably expected to be required to obtain such an authorization.

GCA/USPS-T8-3

Please refer to page 13, lines 7-11, of your prefiled testimony.

(a) Please explain fully any bases (beyond the numerical eligibility levels specified in lines 9-10) for your judgment that there is potential for significant attrition.

(b) (i) Please provide any information available to you concerning the rate(s) of retirement among Postal Service employee groups corresponding to those making up the 28 percent and 21 percent cited in lines 9-10, for the Fiscal Years 2005 through 2011, inclusive.

(ii) Please provide any information available to you, including documents containing factual findings, analyses, or conclusions, regarding the effect of the 2008-2009 recession on (α) the rate(s) of retirement among Postal Service employee groups corresponding to those making up the 28 percent and 21 percent cited in lines 9-10, and (β) the rate(s) of retirement among Postal Service employees in general.

(c) Please refer also to page 18, lines 13-14, of your prefiled testimony. To what Fiscal Years does the phrase "the last several years" in line 13 refer?

GCA/USPS-T8-4

Please refer to page 18, lines 5-7, of your prefiled testimony. Please define the phrase "the full workforce savings" as used at that page and line location.

GCA/USPS-T8-5

Please provide copies of the American Postal Workers Union and National Postal Mail Handlers Union collective bargaining agreements referred to on page 6 of your prefiled testimony, together with all currently effective Memoranda of Understanding applicable to those contracts.